Attachment 18

California Regional Water Quality Control Board
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Alan C. Lloyd, Ph.D.
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

January 10, 2005

Mr. Lance Lauricha
City of Escondido
Public Works Department
Wastewater Collection Division
475 N. Spruce Street
Escondido, CA 92025

In reply refer to:
IC: 01-0031.04

Dear Mr. Lauricha:

SUBJECT: PRETREATMENT COMPLIANCE AUDIT REPORT

FACILITY: CITY OF ESCONDIDO; HALE AVENUE RESOURCE RECOVERY FACILITY (HARRF); ORDER NO. 99-72; NPDES NO. CA 0107981

On August 25-26, 2004, Mr. Paul J. Richter and Mr. Chuck Durham (TetraTech), representing the San Diego Regional Water Quality Control Board, conducted a Pretreatment Compliance Audit (PCA) of the approved industrial pretreatment program for the City of Escondido. The PCA consisted of an interview with the City's pretreatment staff, a review of the pretreatment program files, a review of three industrial user (IU) files, and two IU inspections.

The file review covered the period of August 2003 – August 2004. The City's pretreatment program is generally in compliance with USEPA regulations and appears to be an effective program. The attached PCA report, compiled by our contractor TetraTech, lists six requirements and eight recommendations to bring your program into full compliance with the regulations.

The *Summary Report*, the *WENDB Worksheet*, the *RNC/SNC Worksheet*, and the *Industrial User Site Visit Reports* were included with this letter. The entire PCA Report was not included because most of the attachment documents were reproductions of documents from your records. The complete attachment document is available for review at our office.

We appreciated the assistance of Mr. Frank Anderson, Ms. Jennifer Davis; Ms Cynthia Esparaza and yourself during the PCA.

If you have any questions or comments regarding the contents of the PCA report, please contact Mr. Richter at (858) 627.3929, e-mail at PRichter@waterboards.ca.gov.

Pretreatment Compliance Audit

Summary Report

Discharger:	City of Escondido
Location:	475 North Spruce Street Escondido, CA 92025
Contacts:	Lance Lauricha, Wastewater Collection Division Supervisor Jennifer Davis, Industrial Waste Inspector Cynthia Esparza, Pretreatment Inspector
Inspection Date:	August 25–26, 2004
Inspected by:	Paul Richter, San Diego Regional Water Quality Control Board Chuck Durham, Tetra Tech, Inc.

Attachments

1. Executive Summary

The San Diego Regional Water Quality Control Board (Regional Board), with assistance from Tetra Tech, Inc., conducted a Pretreatment Compliance Audit (PCA) of the City of Escondido (City) on August 25–26, 2004. The previous Pretreatment Compliance Inspection (PCI) performed on this facility took place on October 22, 2002. This audit report describes the primary concerns generated by the August 2004 PCA.

The City's pretreatment program consists of 16 permitted nondomestic dischargers, 12 of which are classified as significant industrial users (SIUs). In addition, all 12 of the SIUs are categorical industrial users (CIUs) subject to federal pretreatment standards. The remaining four permitted facilities are groundwater remediation sites. The members of the City's pretreatment staff appeared to have a good general grasp of the pretreatment requirements, and the inspectors seemed to have a thorough knowledge of their respective nondomestic users. In addition, the City has a strong food service establishment program to control oil and grease problems. In a number of areas, however, the pretreatment program is in need of improvement.

Deficiencies noted during the audit include permits with incorrect limitations, failure to document evaluation of the need for slug discharge control plans, and the use of an improper analytical method. In addition, the local limits listed in the sewer use ordinance (SUO) are not consistent with the permit limits. These and other deficiencies are described in more detail in the body of this report. The City should be able to address these deficiencies with little effort.

2. Introduction

The PCA consisted of three parts: an interview of City staff, a review of the pretreatment program files, and site visits to various permitted dischargers. The interview included a discussion with several members of the City's pretreatment staff regarding the program in general, the City's compliance sampling and inspection procedures and their frequency, and enforcement issues. The file review consisted of examining the files of several nondomestic dischargers. To provide a general overview of the pretreatment program, the files were selected based on the classifications of the nondomestic dischargers. The files of the following dischargers were reviewed during the PCA:

- Escondido Plating (CIU subject to 40 CFR 413.14)
- Circuit Logic (CIU subject to 40 CFR 433.17)
- Goal Line L. P. (CIU subject to 40 CFR 423.17)

Two permitted dischargers were also inspected as part of this audit. Inspectors from Tetra Tech, Inc. accompanied the City's inspectors to assess whether the City's inspection procedures were adequate. To ensure a representative cross section of the City's pretreatment program, the dischargers were selected for inspection based on classification. The facilities of the following dischargers were visited during the PCA:

Local limits were reallocated and submitted to the Regional Board for approval in 2001. The City had not received any formal response from the Regional Board at the time of this audit. City staff indicated that the changes to the local limits were non-substantial per 40 CFR 403.18 in that there were no increases in the overall maximum allowable headworks loading. During the audit, City staff indicated the City plans to further revise its local limits within the next year. The City has sent a letter to the Regional Board as notification of this plan.

The City could not provide documentation that the revised local limits have been incorporated into the SUO. 40 CFR 403 requires that SIU permits contain all applicable limits. In reviewing the permit for Escondido Plating, the audit team noted that the federal limits identified in the permit were consistent with the numerical values listed in 40 CFR 413.46(b); however, the local limits listed in the permit did not match those listed in the SUO. City personnel indicated that local limits were not allocated uniformly to the nondomestic dischargers, but rather based on contribution. City staff members were initially unable to locate documentation to show how alternative standards were derived. Before the audit was completed, a copy of the 2001 local limits revision, as submitted to the Regional Board, was provided to the Tetra Tech auditor. The local limits listed in this document did match those found in the permit issued to Escondido Plating. Based on the comparison of the revised local limits with the values in Escondido Plating's permit, it is evident that in 2001 the local limits were re-allocated and appropriately listed in the SIU permits. However the SUO was never modified. The SUO must be modified and the City is required to notify the Regional Board of the modifications. The City is further required to provide evidence to the Regional Board indicating that the City has officially adopted the 2001 revisions to the local limits.

The City has an established local limit for total toxic organics (TTO) of 2.13 milligrams per liter (mg/L). City representatives could not identify the constituents that comprise the TTO parameter regulated under this limit. The City is required to provide a list in the permit of organic constituents to be regulated under this numerical limit. The Tetra Tech auditor recommends that this identification be included as part of next year's planned revision to the local limits.

4. Legal Authority

40 CFR 403.8(f) requires that every POTW subject to the national pretreatment program have the necessary legal authority to apply and enforce Section 307(b) and (c) and Section 402(b)(8) of the Clean Water Act.

City personnel were unable to provide a signed copy of the City's most recent SUO at the time of the PCA. Multiple unsigned versions of the SUO were provided to the Tetra Tech auditor. At least two of the versions contained differing local limits. City staff were unable to determine the adoption date of either ordinance. Therefore, the City is required to investigate and determine the final adoption date of the most recent SUO and provide that information, along with a signed copy, to the Regional Board.

The permit for Circuit Logic contained a monthly average federal limit for TTO. 40 CFR 433.17 does not specify a monthly average limit for this parameter. City staff could not explain the application of this limit at the time of the PCA. The City is required to modify the permit for this facility by removing any reference to a monthly average federal limit for TTO.

Permits for CIUs list both the local discharge standards and applicable categorical standards. The Tetra Tech inspector recommends that these be modified to clearly identify the applicable limit for each parameter in which both local and federal standards exist. For example, in the permit for Circuit Logic, the City could use bold type to identify the more stringent value for each pollutant by comparison of the daily maximum local limit and daily maximum federal standard.

7. Compliance Monitoring

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require that a POTW develop and implement an inspection and monitoring program to determine, independent of information supplied by nondomestic dischargers, compliance or noncompliance with applicable pretreatment standards and requirements. Furthermore, 40 CFR 403.8(f)(2)(vi) requires POTWs to investigate instances of noncompliance and enforce the regulations as necessary.

7.1 Compliance Sampling

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require that all SIUs be sampled at least once a year. The City performs compliance monitoring at each SIU at least twice a year. The frequency is increased to monthly when violations occur. Compliance must be maintained for 6 consecutive months before the frequency is reduced.

In reviewing the SIU files, the audit team noted that City's contract laboratory has been using an incorrect analytical method. Specifically, the laboratory was using Method 8260 for organics analysis. Method 8260 is a solid waste analytical method and is not authorized by 40 CFR Part 136. 40 CFR Part 403 requires that all monitoring (compliance and self-monitoring) be evaluated using methods approved for wastewater as outlined at 40 CFR Part 136. Any samples evaluated using unapproved methods are invalid. Therefore, the City is required to ensure that all future samples are analyzed using approved methods listed at 40 CFR Part 136. In response to this comment during the exit interview, City staff provided documentation dated April 29, 1999, from the U.S. Environmental Protection Agency (EPA) Region 9 allowing use of Method 8260 for analysis of methyl tertiary butyl ether (MTBE). This waiver from 40 CFR Part 136 pollutants is specific to MTBE only and is not applicable to monitoring conducted as part of the pretreatment program.

7.2 Compliance Inspections

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require that all SIUs be inspected at least once a year. The City inspects each SIU twice a year at a minimum. The frequency is increased when compliance issues arise. Inspections include an office interview with the facility representative; a review of monitoring records; a walk-through of the facility addressing process operations, chemical storage, safety issues, containment issues, and stormwater applications; followed by an exit interview.

7.3 Nondomestic Discharger Site Visits Conducted During the Audit

The Tetra Tech auditor, along with City personnel, inspected two of the permitted nondomestic dischargers as part of the PCA. The dischargers were selected to represent facilities of varying size and classification. The Tetra Tech auditor noted the following during the nondomestic discharger site visits:

- *Escondido Plating.* This discharger is an electroplating job shop that performs chrome-, nickel-, and brass-plating, and operates one shift 5 days a week with an average flow of 2,850 gallons per day (gpd). The discharge from this facility comes from the pre-rinse tank and the dragout rinse tank. Pretreatment consists of pH adjustment with sodium hydroxide. The Tetra Tech auditor noticed that a barrel of hydrochloric acid was left in the middle of the process area with no secondary containment. The Tetra Tech auditor recommends that the City conduct a follow-up inspection to see that this issue is properly addressed.

- *Circuit Logic.* This discharger is a printed circuit board manufacturer that began operation in 1989 and is regulated under 40 CFR 433.17. The facility has an average daily discharge of 18,000 gpd. The discharge from this facility comes from plating rinse baths, scrubbers, and etching baths. A Memtek ion exchange pretreatment unit was installed in 1996. The pH is lowered to approximately 3.0 to remove copper and then raised to approximately 6.0 before the wastestream is mixed with rinse tank waste from the developer room. This facility has multiple process lines (regulated and unregulated) and they are intermingled. As noted during the site visit, the audit team recommends that the City further investigate the flow from each process at this facility to ensure that the application of the combined wastestream formula is not necessary to ensure that limits are being applied appropriately to all process wastestreams.

  The facility representative indicated during the site visit that the 350-gallon copper-plating tank had been replaced with a 500-gallon tank and the 360-gallon tin-plating tank had been replaced with a 600-gallon tank. The facility made these modifications without giving prior notification to the City. The City inspector notified the facility representative that a letter of violation would be issued addressing the failure to properly notify the City of changes to the existing system. The audit team recommends that the City provide a copy of this letter to the Regional Board upon receipt of this report.

discovered during a routine inspection of the facility. The City immediately began the necessary steps to bring a criminal enforcement case against this facility and has asked for assistance from EPA Region 9 staff. The City Attorney was preparing the case at the time of this audit. It is recommended that the City provide quarterly reports to the Regional Board regarding the status of this pending litigation.

The City has taken timely enforcement actions for all the SIUs whose files were reviewed as part of this PCA. Therefore, no action is needed at this time to improve this aspect of the program.

9. Data Management

The City's SIU files were well organized and included facility contact information, compliance data, inspection results, self-monitoring data, and permits. Nondomestic user information is recorded on electronic fact sheets and stored in hard-copy files. Furthermore, an Excel database is used to store all sampling results (compliance and self-monitoring). The Water and Wastewater Department uses an asset management program (AZTEC). City staff indicated that the Public Works Department plans to have access to this system sometime in 2005. All semiannual and annual reports prepared by the City are generated electronically. The City requires that all requests from the public to review files be submitted in writing. All requests are then forwarded to the City Attorney for approval. The City's pretreatment staff provides requested files to the City Attorney and he releases the portion of the file applicable to the submitted request. All files are maintained in a secure room, and confidential files are labeled and separated from regular files.

Pretreatment staff should be aware of and closely monitor pollutant trends in influent, effluent, and sludge to demonstrate pollutant reductions or to identify pollutant loading increases. In order to demonstrate the overall effectiveness of the City's pretreatment program, the audit team recommends that City pretreatment staff evaluate historical data for the WWTF influent, effluent, and sludge, and document the impact from pollutant loadings.

10. Pretreatment Program Outreach

The City sponsors public awareness and education events throughout the year. These events include distributing educational information during street fairs and carnivals, conducting presentations at schools relating to the stormwater and pretreatment programs, and distributing brochures via mass mailings twice a year. In addition, City staff provide a copy of all available handouts relating to pretreatment, stormwater, and prohibited discharges to all new food service establishments and automotive facilities upon first inspection.

date of either version. Therefore, the City is required to investigate and determine the final adoption date of the most recent SUO and provide that information, along with a signed copy, to the Regional Board. (Section 4, Legal Authority)

4. The permit issued to Circuit Logic contained a monthly average federal limit for TTO. 40 CFR 433.17 does not specify a monthly average limit for this parameter. This City is required to modify the permit for this facility by removing any reference to a monthly average federal limit for TTO. (Section 6, Control Mechanisms)

5. Permits for CIUs list both the local discharge standards and applicable categorical standards. The Tetra Tech inspector recommends that these be modified to clearly identify the applicable limit for each parameter in which both local and federal standards exist. For example, in the permit for Circuit Logic, the City could use bold type to identify the more stringent value for each pollutant by comparison of the daily maximum local limit and daily maximum federal standard. (Section 6, Control Mechanisms)

6. The City's contracted laboratory has been using an incorrect analytical method. Specifically, the laboratory has been using Method 8260 [what method should be used? Should we list it? *Paul, the acceptable method varies with pollutants in this category. I think its best to simply refer them to 40 CFR 136 rather than listing each one. The primary point here is that 8260B is not one of the approved methods.*]for organics analysis. 40 CFR Part 403 requires that all monitoring (compliance and self-monitoring) be evaluated using methods approved for wastewater as outlined in 40 CFR Part 136. Any samples evaluated using unapproved methods are invalid. Therefore, the City is required to ensure that all future samples are analyzed using approved methods listed at 40 CFR Part 136. (Section 7.1, Compliance Sampling)

7. During the site visit at Escondido Plating, the Tetra Tech auditor noticed that a barrel of hydrochloric acid was left in the middle of the process area with no secondary containment. The Tetra Tech auditor recommends that the City conduct a follow-up inspection to see that this issue is properly addressed. (Section 7.3, Nondomestic Discharger Site Visits Conducted During the Audit)

8. Circuit Logic has multiple process lines (regulated and unregulated) that are intermingled, but it has only one sampling point. As noted during the site visit, the Tetra Tech auditor recommends that the City further investigate the flow from each process at this facility to ensure that the application of the combined wastestream formula is not necessary to ensure that limits are being applied appropriately to all process wastestreams. (Section 7.3, Nondomestic Discharger Site Visits Conducted During the Audit)

9. The inspection at Circuit Logic revealed that the 350-gallon copper-plating tank had been replaced with a 500-gallon tank and the 360-gallon tin-plating tank had been replaced with a 600-gallon tank. The facility made these modifications without first notifying the City. The City inspector notified the facility representative that a letter of violation would be issued addressing the failure to

communication avenues necessary to implement a successful source control program. (Section 11, Additional Comments)

Attachments

Attachment A	WENDB Data Sheet
Attachment B	RNC/SNC Worksheet
Attachment C	Escondido Plating File Review Information
Attachment D	Circuit Logic File Review Information
Attachment E	Goal Line File Review Information
Attachment F	Industrial User Site Visit Reports
Attachment G	Sewer Use Ordinance
Attachment H	Enforcement Response Plan
Attachment I	Multijurisdictional Agreement

WENDB DATA ENTRY WORKSHEET

WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

CA name: City of Escondido

NPDES number: CA0107981

Date of inspection: August 25-26, 2004

	Date entered into PCS		
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.B.2.a	12
• Number of CIUs	CIUS	II.B.2.a	12
- Number of SIUs without control mechanism	NOCM	II.C.1.b	0
- Number of SIUs not inspected or sampled	NOIN	II.E.2	0
- Number of SIUs in SNC** with standards or reporting	PSNC	Att. A.B.4	1
- Number of SIUs in SNC with self-monitoring	MSNC	Att. A.B.4	1
- Number of SIUs in SNC with self-monitoring and not Inspected or sampled	SNIN	II.F.5	0

*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."
**AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

Escondido Plating was found to be in SNC in 2003 for failure to submit a required self-monitoring report within 30 days of the specified due date. The facility was published in the newspaper.

WENDB DATA ENTRY WORKSHEET

COMPLETED BY: Chuck Durham DATE: October 15, 2004

TITLE: Senior Engineer TELEPHONE: 615-888-2928

RNC DATA ENTRY WORKSHEET

DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

CA name: City of Escondido

NPDES number: CA0107981

Date of inspection: August 25-26, 2004 | Date entered into PCS

		Level	Checklist Reference
NA	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
NA	Failure to submit required reports within 30 days	I	Att. A.A.3
NA	Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
NA	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
NA	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
NA	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
NA	Other (specify)	II	

SNC

NA	CA in SNC for violation of any Level I criterion
NA	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: Chuck Durham DATE: October 15, 2004

TITLE: Senior Engineer TELEPHONE: 615-888-2928

IU SITE VISIT DATA SHEET

TRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name of industry: Escondido Plating

Address of industry: 860 Metcalf Street, Escondido, CA 92025

Date of visit: August 26, 2004 | Time of visit: 10:30

Name of inspectors:

Jennifer Davis, City of Escondido
Cindy Esparza, City of Escondido
Lance Lauricha, City of Escondido
Chuck Durham, Tetra Tech, Inc.

Provide the name(s) and title(s) of industry representative(s)

Name	Title
Don Prestage	Owner

U Permit Number: 11004 | Exp. Date: June 30, 2005 | IU Classification: 40 CFR 413.14

nspection Type/Purpose						
	√	Scheduled		Unscheduled	√	PCA
		PCI		New Company		Compliant

lease provide the following documentation:

. Nature of operation:

This is a job shop electroplating facility

. Number of employees:	5	Number of shifts:	1	Hours of operation:	5 days/week

. ..ater source:
ity of Escondido.

. Wastestream flow(s) discharged to the POTW:

Sanitary:	(gpd)	Process:	2,850 (gpd)	Combined:	(gpd)

Describe any significant changes in process or flow:

elocated the acid copper tank (free standing tank) in July 2004. This had no impact on the water flow ough the facility or the wastewater discharge makeup.

Type of pretreatment system (Describe):
etreatment consists of pH adjustment using sodium hydroxide and hydrochloric acid.

	Continuous flow		Batch	√	Combined
Condition/operation of pretreatment system:		Good	√	Fair	Poor

Process area description (identify raw materials and processes used):

e manufacturing area includes chrome, nickel, copper, and brass plating. The discharge is from pre- se and dragout rinse tanks.

Condition/operation of process area:		Good	√	Fair		Poor
(eral housekeeping:		Good	√	Fair		Poor

IU SITE VISIT DATA SHEET

RUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

N e of industry: Circuit Logic

Address of industry: 311 Enterprise Street, Escondido, CA 92025

Date of visit: August 26, 2004 | Time of visit: 1:00

Name of inspectors:

Jennifer Davis, City of Escondido
Cindy Esparza, City of Escondido
Lance Lauricha, City of Escondido
Chuck Durham, Tetra Tech, Inc.

Provide the name(s) and title(s) of industry representative(s)

Name	Title
Ignacio Hernandez	President

U Permit Number: 11011 | Exp. Date: June 30, 2005 | IU Classification: 40 CFR 433.17

nspection Type/Purpose						
	√	Scheduled		Unscheduled	√	PCA
		PCI		New Company		Compliant

lease provide the following documentation.

. Nature of operation:

This facility is a printed circuit board manufacture that began operations in 1989.

mber of employees:	24	Number of shifts:	1.5	Hours of operation:	8:00-03:30 12:00-7:30

. Water source:

ity of Escondido.

. Wastestream flow(s) discharged to the POTW:

Sanitary:	(gpd)	Process:	18,000 (gpd)	Combined:	(gpd)

. Describe any significant changes in process or flow:

ne facility recently replaced two tanks increasing capacity a total of approximately 400 gallons. The 350-allon copper plating tank was replaced with a 500-gallon tank; the 360-gallon tin plating tank was placed with a 600 gallon tank.

Type of pretreatment system (Describe):

astewater is treated using an ion exchange unit. pH is lowered to 2.5-3.0 to remove copper and then evated back up to 6.0 after waste is mixed with rinse water from the developer room.

	Continuous flow		Batch	√	Combined
Condition/operation of pretreatment system:		Good	√ Fair		Poor

Process area description (identify raw materials and processes used):

illing of circuit boards. .

ndition/operation of process area:	√	Good		Fair		Poor
eral housekeeping:	√	Good		Fair		Poor